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UNITED STATES DISTRICT COURT

SOUTHERN DISTRICT OF CALIFORNIA

**(HONORABLE ROGER T. BENITEZ)**

UNITED STATES OF AMERICA,

Plaintiff,

v.

LAZARO LOPEZ-GONZALES,

Defendant.

) CASE NO. 07CR3393-BEN

) DATE: February 4, 2008

) TIME: 2:00 P.M.

) NOTICE OF MOTIONS AND MOTIONS TO:

) 1) COMPEL PRODUCTION OF DISCOVERY

) AND PRESERVE EVIDENCE;

) 2) GRANT LEAVE TO FILE FURTHER

) MOTIONS

TO: KAREN P. HEWITT, UNITED STATES ATTORNEY, AND  
STEVEN D. DeSALVO, ASSISTANT UNITED STATES ATTORNEY:

PLEASE TAKE NOTICE that on Monday, February 4, 2008, at 2:00 p.m., or as soon thereafter as counsel may be heard, Mr. Lopez-Gonzales, by and through his attorneys, Michelle Betancourt, and Federal Defenders of San Diego, Inc., will ask this Court to enter an order granting the following motions.

**MOTIONS**

Mr. Lopez-Gonzales, by and through his attorneys, Michelle Betancourt, and Federal Defenders of San Diego, Inc., moves this Court pursuant to the United States Constitution, the Federal Rules of Criminal Procedure, and all other applicable statutes, case law, and local rules for an order:

(1) Compelling Production of Discovery and Preserving Evidence;

(2) Granting Leave to File Further Motions.

These motions are based upon the instant motions and notice of motions, the attached statement of facts and memorandum of points and authorities, the files and records in the above-captioned matter, and any and all other materials that may come to this Court's attention prior to or during the hearing of these motions.

Respectfully submitted,

s/ Michelle Betancourt

Dated: January 31, 2008

**MICHELLE BETANCOURT**  
Federal Defenders of San Diego, Inc.  
Attorneys for Mr. Lopez-Gonzales